

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MOBILEMEDIA IDEAS LLC

Plaintiff,

v.

**RESEARCH IN MOTION LIMITED, and
RESEARCH IN MOTION
CORPORATION**

Defendants.

§
§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 3:11-cv-02353-N

UNOPPOSED MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Plaintiff MobileMedia Ideas LLC (“MMI”) moves the Court for leave to file the Amended Complaint attached as Exhibit A. The Amended Complaint adds four new causes of action alleging that Defendants Research in Motion Limited and Research in Motion Corporation (collectively “RIM”) infringe four additional patents (U.S. Patent Nos. 5,490,170, 6,049,796, 6,871,048 and 6,441,828). In addition, the Amended Complaint adds to the list of accused devices a number of products that have been released by RIM since the filing of the Complaint.

RIM does not oppose the relief requested by MMI in this motion.

Dated October 27, 2011

/s/ Mark E. Turk

Michael P. Lynn
State Bar No. 12738500
Email: mlynn@lynnllp.com
Eric W. Pinker, P.C.
State Bar No. 16016550
Email: epinker@lynnllp.com
Mark E. Turk
State Bar No. 00786298
Email: mturk@lynnllp.com
LYNN TILLOTSON PINKER & COX, LLP
2100 Ross Avenue, Suite 2700
Dallas, Texas 75201
(214) 981-3800
(214) 981-3839 – telecopier

Garrard Beeney
Admitted pro hac vice
Marc De Leeuw
Admitted pro hac vice
Adam R. Brebner
Admitted pro hac vice
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
(212) 558-4000

Kenneth Rubenstein
Admitted pro hac vice
Anthony Coles
Admitted pro hac vice
PROSKAUER ROSE LLP
1585 Broadway
New York, New York 10036
(212) 969-3000

**ATTORNEYS FOR PLAINTIFF
MOBILEMEDIA IDEAS LLC**

CERTIFICATE OF CONFERENCE

Counsel for MMI and counsel for RIM conferred by telephone regarding the relief requested in this motion. RIM is unopposed.

/s/ Mark E. Turk

Mark E. Turk

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2011, a copy of the foregoing was electronically filed. Notice of this filing will be sent to all counsel of record by operation of the Court's Electronic Filing System.

/s/ Mark E. Turk

Mark E. Turk

4834-8719-2589, v. 1